

December 30, 2008

FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Complainant:
Jay Weeldreyer
17116 139th Pl SE
Renton, WA 98058
206.650.4585

2009 JAN -7 A 10:36

MUR # 6156

Respondent(s):
Joe Becker, Chief Counsel Ron Paul 2008 PCC
Llew Moore, Campaign Director, Ron Paul 2008 PCC
Joe Seehusen, Assistant Campaign Director, Ron Paul 2008 PCC
Deanna Watts, Treasurer, Ron Paul 2008 PCC

Office of General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Counsel:

I, Jay Weeldreyer, do solemnly swear and charge that during the first quarter of 2008, in the states of Iowa, Nevada and Washington that Joe Becker, Llew Moore, Deanna Watts, and perhaps others at the executive level of the Ron Paul 2008 PCC did knowingly and willingly violate campaign finance laws limiting the contributions of individuals to a maximum of \$2,300 by accepting and retaining in-kind donations from me, Jay Weeldreyer, in excess of an additional \$1,700 and totaling greater than \$4,000.

1. In 2007, my personal cash contributions to the Ron Paul 2008 PCC totaled \$2,350. Upon notification by Deanna Watts, Treasurer, of the overage via letter in 2008, I requested and received a refund for the overage of \$50.
2. Beginning on December 16th 2007 and ending on or about February 2 2008, I, Jay Weeldreyer, was retained on contract by the Ron Paul 2008 PCC as part of the senior leadership team, operating with the title of "Field Director." This was a paid political position, as a campaign operator in charge of interfacing with volunteers and supporters.
3. As Field Director, one of my responsibilities included the purchase of goods and services on behalf of the campaign through the use of my personal banking and credit resources. Those purchases were to be reimbursed via the customary filing of expense reports and accompanied with receipts.
4. All but the final expense report were processed in accordance to our agreement and in accordance to campaign finance laws.
5. My final expense report was filed on February 5th, totaling \$5,722.11 (since then, amended to \$5,812.70) in purchases made on behalf of the Ron Paul 2008 PCC. The reimbursement check totaled \$4,020.19, leaving a balance of \$1,792.51 unreimbursed.
6. I charge that the unreimbursed sum of \$1,792.51 constitutes an in-kind campaign contribution, in excess of the \$2,300 cash contribution already made.
7. The fact of this in-kind contribution has been clearly communicated to Llew More, Joe Seehusen, Kent Snyder, Joe Becker and Deanna Watts, all of whom held executive level positions with Ron Paul 2008 PCC, with the explicit request that appropriate steps be taken to reduce my contributions to the legal limits, and to

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reimburse the \$1,700+ in expenses charged to my accounts on behalf of the campaign.

8. No response was received from anybody within the campaign.
9. I retained representation in the form of hiring Jean Jorgensen, Attorney at Law, to assist in the recovery of unintentional donations above and beyond the legal limits.
10. Jean Jorgensen reviewed the supporting documents, the relevant statutes, and communicated these facts directly to Joe Becker on several occasions via telephone conversations and email throughout 2008 regarding this matter.
11. Joe Becker was provided additional copies of early communications authorizing Jay Weeldreyer to make expenditures, copies of the expense reports, copies of all related receipts, and copies of statements made by my superiors attesting to the fact that the un-reimbursed expenses, were in-fact, campaign expenses explicitly authorized by them in their official capacity and that these expenses should be reimbursed.

Despite these documented facts, Joe Becker et. al, have chosen to remain in violation of the law, and have not reimbursed the funds received from me, without my consent, above and beyond the \$2,300 cash donations. Mr. Becker is fully aware of the fact of these donations, of our position on these donations, of the high probability that he is operating in violation of FEC regulations regarding in-kind donations, and he has chosen not to take the appropriate corrective action of refunding said moneys.

I did not willingly make these in-kind contributions, and have attempted to resolve this matter---to reduce my contributions within legal limits via the proper process of reimbursement as was customary and normal---without success. As such, I am compelled to report these facts directly to the office of General Counsel at the FEC in order to ensure they are properly and fully investigated if they are, in fact, a violation of campaign finance laws.

A partial set of supporting documentation is included as attachments to this communication. A more complete set is available upon request and can be provided in hard-copy form via fax or postal service, or electronic copy via email.

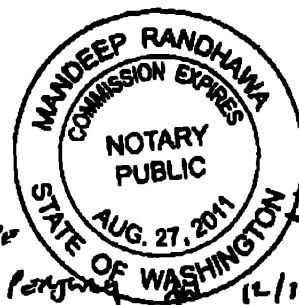
Regards,

Jay Weeldreyer 12/10/08

Jay Weeldreyer
Field Director
Ron Paul 2008
206.650.4585

I CERTIFY THESE STATEMENTS TO BE

TRUE & ACCURATE UNDER PENALTY OF PERJURY 12/10/08



Enclosures:

3 Original Copies of Complaint

1 Copy Set of Supporting Documents

**Cash Donation Reimbursement notice, my response, refund check

**Final Expense Report, receipts

**Partial reimbursement check

**Various communications to Joe Becker, Maureen Moore, Llew Moore, Joe Seehusen,
Kent Snyder,

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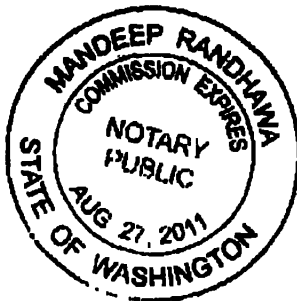
ALL-PURPOSE ACKNOWLEDGEMENT

STATE OF Washington
COUNTY OF KING
CUSTOMER NAME JAY WEELDREYER

On 12/30/08 before me, Mandeep Randhawa, a Notary Public,
(DATE)

personally appeared, JAY WEELDREYER

____ personally known to me OR ☒ proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of the which the person(s) acted, executed the instrument.



WITNESS my hand and official seal.

Mandeep Randhawa
NOTARY SIGNATURE

My Commission Expires: AUG 27, 2011